

BATHAE DUNNE LLP

Yavar Bathae (CA 282388)
yavar@bathaeedunne.com
Andrew C. Wolinsky (*pro hac vice*)
awolinsky@bathaeedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)
bdunne@bathaeedunne.com
Edward M. Grauman (*pro hac vice*)
egrauman@bathaeedunne.com
901 South MoPac Expressway
Plaza I, Suite 300
Austin, TX 78746
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the
Advertiser Class*

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Kristen M. Anderson (CA 246108)
kanderson@scott-scott.com
230 Park Avenue, 17th Floor
New York, NY 10169
Tel.: (212) 223-6444

Christopher M. Burke (CA 214799)
cburke@scott-scott.com
David H. Goldberger (CA 225869)
dgoldberger@scott-scott.com
Kate Lv (CA 302704)
klv@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565

Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537

(Additional counsel on signature page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

CLASS ACTION

**DECLARATION OF BRIAN J. DUNNE IN
SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a Partner at Bathae Dunne LLP, Interim
4 Co-Lead Counsel for Advertiser Plaintiffs in the above-captioned *Klein* matter. I have personal
5 knowledge of the facts set forth here, and if called as a witness, I would and could testify competently
6 to them.

7 2. This declaration is made in support of Advertiser Plaintiffs' Administrative Motion to
8 Consider Whether Another Party's Material Should Be Sealed, filed in connection with the
9 concurrently filed discovery dispute letter ("Letter").

10 3. Certain documents and information referenced in the Letter have been designated by
11 Defendant Meta Platforms, Inc. as "Confidential" or "Highly Confidential" under the Stipulated
12 Protective Order (Dkt. No. 111).

13 4. Portions of the Letter referencing or reflecting the contents of the documents and
14 information designated by Meta Platforms as "Confidential" or "Highly Confidential" have been
15 redacted from the publicly filed version of the Letter. *See* Civil L.R. 79-5(e)(1).

16 5. An unredacted version of the Letter with these references highlighted is filed herewith.
17 *See* Civil L.R. 79-5(e)(2), (f)(1).

18 6. Advertiser Plaintiffs' request is limited to documents and information produced by
19 Meta Platforms marked Confidential or Highly Confidential, or information directly reflecting
20 documents and information produced by Meta Platforms marked Confidential or Highly Confidential.
21 This request is thus narrowly tailored to seek sealing of only potentially sealable material.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on July 27, 2022, in Austin, Texas.

24

25

/s/ Brian J. Dunne
Brian J. Dunne

26

27

28